

MARK D. LITVACK (SBN 183652)
mark.litvack@pillsburylaw.com
MICHAEL R. KREINER (SBN 316625)
michael.kreiner@pillsburylaw.com
PILLSBURY WINTHROP SHAW PITTMAN LLP
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: 213.488.7100
Facsimile: 213.629.1033

Attorneys for Plaintiff
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY,

Plaintiff,

vs.

Zhang Yuzhen, an individual; Fan Miao, an
individual; and all persons unknown, claiming
any legal or equitable right, title, estate, lien, or
interest in the property described in the
complaint adverse to plaintiff's title, or any cloud
upon plaintiff's title thereto,

Defendants.

Case No. 5:19-cv-2904

**THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY'S COMPLAINT TO
QUIET TITLE**

Plaintiff The Board of Trustees of the Leland Stanford Junior University ("Stanford" or
"Plaintiff") alleges as follows:

INTRODUCTION

The Hoover Institution Library & Archives at Stanford University hosts one of the most
extensive and world-renowned collections on modern Chinese history in the United States. As a
result, it was the wish of prominent Chinese historian and politician Li Rui that his collection be
given to the Hoover Institution Library & Archives to be preserved and freely available for scholarly
research and public review. The collection includes his letters, meeting minutes, work notes, diaries,

1 poetry, and photographs and provides an important record on the history of contemporary China.

2 The Hoover Institution Library & Archives is committed to collecting, preserving, describing, and
3 making available the most important historical materials of the twentieth and twenty-first centuries.

4 1. Stanford is recognized as one of the world's leading research and teaching
5 institutions.

6 2. Stanford was founded to promote the public welfare by exercising an influence on
7 behalf of humanity and civilization.

8 3. Founded in 1891, over a century later, Stanford remains dedicated to finding solutions
9 to the great challenges of the day and to preparing its students for leadership in today's complex
10 world.

11 4. The Hoover Institution ("Hoover") is part of Stanford.

12 5. Hoover is a public policy research center devoted to advanced study of politics,
13 economics, and political economy—both domestic and foreign—as well as international affairs.
14 With its world-renowned group of scholars and ongoing programs of policy-oriented research,
15 Hoover puts its accumulated knowledge to work as a prominent contributor to the world marketplace
16 of ideas defining a free society.

17 6. Consistent with this, the mission statement of Hoover states in part "The overall
18 mission of this Institution is, from its records, to recall the voice of experience against the making of
19 war, and by the study of these records and their publication, to recall man's endeavors to make and
20 preserve peace."

21 7. The Library & Archives at Hoover, with its vast original documentation on modern
22 history, is a core component of Hoover. Founded in 1919, the Hoover Institution Library & Archives
23 is dedicated to documenting war, revolution, and peace in the twentieth and twenty-first centuries.
24 With nearly one million volumes and more than six thousand archival collections from 171
25 countries, Hoover supports a vibrant community of scholars and a broad public interested in the
26 meaning and role of history.

27 8. Part of the Hoover Institution Archives is the East Asia Collection, which includes
28 private papers donated or deposited by former national leaders, public servants, military personnel,

1 and others from China, Hong Kong, Taiwan, Japan, Korea, and other parts of East Asia.

2 9. Part of the East Asia Collection is the China Collection. Hoover holds one of the
3 world's largest collections outside of China relating to the Communist Party of China ("CPC")
4 political movement. Hoover's many Chinese collections document political, economic, and social
5 developments during the revolution of 1911, the warlord period, the civil war, and the post-1949
6 period. Holdings on pre-1949 Republican China, including Nationalist government documents and
7 CPC materials, are particularly robust.

8 10. Hoover is home to hundreds of rare pre-1949 Chinese publications, including the
9 diaries of Chiang Kai-shek. It is also home to numerous personal papers of U.S. military and
10 political leaders deeply involved in modern China, such as Joseph Stilwell, Albert Wedemeyer,
11 Lauchlin Currie, and Claire Chennault.

12 11. Given the China Collection's variety, its complementarities, and its significance, the
13 Hoover Institution Archives has become one of the world's most influential hubs for modern and
14 contemporary Chinese studies.

15 12. Li Rui was a prominent Chinese political figure and outspoken critic of the leaders of
16 the CPC until his death on February 16, 2019.

17 13. Born in 1917, Li Rui joined the CPC in 1937. In the mid-1950s, he was appointed as
18 a personal secretary to Mao Zedong, placing him at the center of political activity in China.

19 14. After becoming an outspoken critic of Mao and of the Great Leap Forward, Li Rui
20 was ousted from the CPC and was imprisoned. In 1978, after twenty years in prison, and after Mao's
21 death, the CPC reinstated Li Rui's membership. Li Rui then became the vice director of the
22 Organization Department of the Communist Party, and later, as a vice minister of the Ministry of
23 Water Conservation, opposed the planning and construction of the Yangtze Three Gorges Dam.

24 15. Thereafter, Li Rui remained a vocal critic of the CPC's leaders and its policies. In
25 1989, he wrote the book *The Veritable Records of the Lushan Conference*, which disputed the CPC's
26 account of the famine that resulted from the Great Leap Forward. After publishing an open letter to
27 Hu Jintao in 2002, in which he advocated for reforming the CPC, the CPC's Propaganda Department
28 banned Li Rui from being published in the media. Until 2016, Li Rui was the head of the Chinese

1 journal *China Through the Ages*, which discussed politically sensitive episodes of Chinese history,
2 including topics about which the CPC had restricted coverage.

3 **THE DONATION**

4 16. On information and belief, Li Rui created personal diaries from at least 1938 to 2018
5 (the “Diaries”).

6 17. On information and belief, Li Rui also maintained letters, photographs, and other
7 materials from 1938 to 2018 (the physical copies of these materials and the Diaries, exclusive of the
8 intellectual property rights to these materials, are referred to collectively as the “Donation”). The
9 contents of the Donation are identified in Exhibit A, attached hereto.

10 18. Li Rui visited Stanford and Hoover from February 15, 1989 to February 17, 1989.
11 Upon Li Rui’s visit to Hoover, Hoover’s deputy East Asian curator, Mark Tam, and Chinese
12 librarian, Chang Fu-mei, showcased some of Hoover’s historical treasures for Li Rui, including rare
13 CPC publications from the 1930s and 1940s, the first issue of *Liberation Daily*, the personal papers
14 of Nym Wales and T. V. Soong, and CPC publications from the Yan’an era (1937–45).

15 19. In an interview dated October 19, 2013, Li Rui praised Hoover, particularly its
16 modern China Collection, including the diaries of Chiang Kai-shek and the May Fourth Movement
17 and Cultural Revolution materials.

18 20. On information and belief, due to Hoover’s reputation for its holdings of twentieth
19 century Chinese historical materials, Li Rui gave the Donation to his daughter, Li Nanyang,
20 beginning around early 2014, for the purpose of transferring ownership of the Donation to Stanford.
21 On information and belief, Li Rui instructed Li Nanyang to take the Donation from China to the
22 United States and to make a permanent gift of the Donation to Stanford, to be owned by Hoover.

23 21. Between March 3, 2014, and July 31, 2018, Li Nanyang gave the Donation to
24 Stanford.

25 22. Between March 3, 2014, and February 13, 2019—before Li Rui’s death—Li Nanyang
26 executed agreements transferring ownership of the Donation to Stanford.

27 23. On information and belief, Li Nanyang last departed from China on November 14,
28 2018, three months before Li Rui’s death on February 16, 2019.

JURISDICTION AND VENUE

34. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. § 1332(a)(2) based on diversity of citizenship. As alleged above, Stanford resides in California for purposes of diversity. Upon information and belief, Defendants are residents of the People's Republic of China. Jurisdiction is also proper under 28 U.S.C. § 1332(b), as the Donation is valued at over \$75,000.

35. Venue is proper in this district under 28 U.S.C. § 1391, as the property in question, the Donation, is located at Stanford University in Stanford, California, which is located in this District.

FIRST CAUSE OF ACTION

(Quiet Title Under Cal. Code Civ. Proc. §§ 760.010 *et seq.*)

36. Stanford repeats the allegations in paragraphs 1 through 35 and incorporates them by reference as if fully set forth herein.

37. Stanford seeks to quiet title against the claims of Defendants as to any other right, estate, lien, or interest whatsoever in and to the Donation. Specifically, Stanford seeks an order that Stanford's interest is the only legal or beneficial interest in title to the Donation, and that the claims of any of the Defendants are without basis.

38. The claims of the Defendants, and each of them, are without any right whatsoever, and such Defendants have no right, title, estate, lien, or interest whatsoever in the Donation or any part thereof.

39. Stanford seeks to quiet title as of the dates that possession of the Donation was transferred to Stanford. Title vests in Stanford as of those dates in order to establish that the Donation is not included in Li Rui's estate and is therefore not properly the subject of the Beijing Lawsuit.

///

///

///

///

1 WHEREFORE, Stanford prays for judgment as follows:

2 1. For a declaration that Stanford's interest is the only legal or beneficial interest in title
3 to the Donation, and that the claims of Defendants are without basis;

4 2. For costs of suit herein incurred; and

5 3. For such other and further relief as the Court may deem just and proper.

6

7

8

Dated: May 24, 2019

9

MARK D. LITVACK
MICHAEL R. KREINER
PILLSBURY WINTHROP SHAW PITTMAN LLP

10

11

By: /S/ MARK D. LITVACK
MARK D. LITVACK

12

Attorneys for Plaintiff THE BOARD OF
TRUSTEES OF THE LELAND STANFORD
JUNIOR UNIVERSITY

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

EXHIBIT A

| DATE RECEIVED | BOX NO. | FOLDER NO. | ITEM NO. | ITEM DESCRIPTION | ITEM DESCRIPTION (CHINESE) | CREATOR(S) ROMANIZED | CREATOR(S) CHINESE | DATE(S) |
|---------------|---------|------------|----------|--|---|---|----------------------------------|-----------------|
| 03/03/2014 | 1 | 1-16 | 1-77 | Volume 1: Correspondence from Li Rui to Fan Yuanzhen | 第一本: 李锐写给范元甄信 | Li Rui | 李锐 | 1939-1942 |
| 03/03/2014 | 1 | 17-32 | 1-77 | Volume 2: Correspondence from Li Rui to Fan Yuanzhen | 第二本: 李锐写给范元甄信 | Li Rui | 李锐 | 1942-1946 |
| 03/03/2014 | 2 | 1-16 | 1-77 | Volume 3: Correspondence from Li Rui to Fan Yuanzhen | 第三本: 李锐写给范元甄信 | Li Rui | 李锐 | 1946 |
| 03/03/2014 | 2 | 17-32 | 1-77 | Volume 4: Correspondence from Li Rui to Fan Yuanzhen | 第四本: 李锐写给范元甄信 | Li Rui | 李锐 | 1946-1947 |
| 03/03/2014 | 3 | 1-16 | 1-75 | Volume 5: Correspondence from Li Rui to Fan Yuanzhen | 第五本: 李锐写给范元甄信 | Li Rui | 李锐 | 1947 |
| 03/03/2014 | 3 | 17-34 | 1-86 | Volume 6: Correspondence from Li Rui to Fan Yuanzhen | 第六本: 李锐写给范元甄信 | Li Rui | 李锐 | 1947-1949 |
| 03/03/2014 | 4 | 1-16 | 1-76 | Volume 7: Correspondence from Li Rui to Fan Yuanzhen | 第七本: 李锐写给范元甄信 | Li Rui | 李锐 | 1949-1952 |
| 03/03/2014 | 4 | 17-32 | 1-76 | Volume 8: Correspondence from Li Rui to Fan Yuanzhen | 第八本: 李锐写给范元甄信 | Li Rui | 李锐 | 1952 |
| 03/03/2014 | 5 | 1-16 | 1-76 | Volume 9: Correspondence from Li Rui to Fan Yuanzhen | 第九本: 李锐写给范元甄信 | Li Rui | 李锐 | 1952 |
| 03/03/2014 | 5 | 17-32 | 1-77 | Volume 10: Correspondence from Li Rui to Fan Yuanzhen | 第十本: 李锐写给范元甄信 | Li Rui | 李锐 | 1952-1953 |
| 03/03/2014 | 6 | 1-16 | 1-77 | Volume 11: Correspondence from Li Rui to Fan Yuanzhen | 第十一本: 李锐写给范元甄信 | Li Rui | 李锐 | 1954-1957 |
| 03/03/2014 | 6 | 17-32 | 1-77 | Volume 12: Correspondence from Li Rui to Fan Yuanzhen | 第十二本: 李锐写给范元甄信 | Li Rui | 李锐 | 1957-1960 |
| 03/03/2014 | 7 | 1-16 | 1-74 | Volume 1: Correspondence from Fan Yuanzhen to Li Rui | 第一本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1939-1941 |
| 03/03/2014 | 7 | 17-32 | 1-77 | Volume 2: Correspondence from Fan Yuanzhen to Li Rui | 第二本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1941-1942 |
| 03/03/2014 | 8 | 1-16 | 1-77 | Volume 3: Correspondence from Fan Yuanzhen to Li Rui | 第三本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1942-1946 |
| 03/03/2014 | 8 | 17-32 | 1-77 | Volume 4: Correspondence from Fan Yuanzhen to Li Rui | 第四本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1946-1947 |
| 03/03/2014 | 9 | 1-16 | 1-75 | Volume 5: Correspondence from Fan Yuanzhen to Li Rui | 第五本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1947 |
| 03/03/2014 | 9 | 17-32 | 1-77 | Volume 6: Correspondence from Fan Yuanzhen to Li Rui | 第六本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1947-1950 |
| 03/03/2014 | 10 | 1-16 | 1-75 | Volume 7: Correspondence from Fan Yuanzhen to Li Rui | 第七本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1950-1952 |
| 03/03/2014 | 10 | 17-24 | 1-35 | Volume 8: Correspondence from Fan Yuanzhen to Li Rui | 第八本: 范元甄写给李锐信 | Fan Yuanzhen | 范元甄 | 1952-1959 |
| 03/03/2014 | 11 | 1 | | Fan Yuanzhen Diary | 范元甄日记 | Fan Yuanzhen | 范元甄 | 1938 |
| 03/03/2014 | 11 | 2 | | Fan Yuanzhen Diary | 范元甄日记 | Fan Yuanzhen | 范元甄 | 1939-1940 |
| 03/03/2014 | 11 | 3 | | Fan Yuanzhen Diary | 范元甄日记 | Fan Yuanzhen | 范元甄 | 1940 |
| 03/03/2014 | 11 | 4 | | Fan Yuanzhen Diary | 范元甄日记 | Fan Yuanzhen | 范元甄 | 1941 |
| 03/03/2014 | 11 | 5 | | Fan Yuanzhen Diary | 范元甄日记 | Fan Yuanzhen | 范元甄 | 1942-1943 |
| 03/03/2014 | 11 | 6 | | Fan Yuanzhen Diary | 范元甄日记 | Fan Yuanzhen | 范元甄 | 1943-1944 |
| 03/03/2014 | 11 | 7 | | Fan Yuanzhen Diary | 范元甄日记 | Fan Yuanzhen | 范元甄 | 1947 |
| 03/03/2014 | 11 | 8 | | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1948 |
| 03/03/2014 | 11 | 9 | | Fan Yuanzhen & Li Rui Diary | 范元甄, 李锐合记日记 | Fan Yuanzhen; Li Rui | 范元甄; 李锐 | 1951-1952 |
| 05/12/2014 | 11 | 10 | | Li Rui's Gentian Violet Poems, Marx Book (includes donor notes) | 李锐秦城监狱龙胆紫诗 (马克思书) | Li Rui | 李锐 | 1973-1975 |
| 05/12/2014 | 11 | 11 | | Li Rui's Notebook, Lushan Conference minutes | 李锐1959年庐山会议原始记录本 | Li Rui | 李锐 | 07/03/1959- |
| 05/12/2014 | 12 | 1 | | Li Rui's Gentian Violet Poems, Lenin Book | 李锐秦城监狱龙胆紫诗 (列宁书) | Li Rui | 李锐 | 1973-1975 |
| 05/12/2014 | 12 | 2 | 1-151 | Volume 1: Li Rui Family Correspondence (Letters sent to Li Wanhua, Li Yinghua, Wang Tiezheng, Wei Ni, Qian Zhengying, Chen Yun, Ye Jianying, Liu Zuchun) | 李锐和家庭成员通信 (给李琬华, 李英华, 王铁铮, 伟妮, 钱正英, 陈云, 叶剑英、华国锋、唐亦安、刘祖春) | Li Rui | 李锐 | 1975-1977 |
| 05/12/2014 | 13 | 1 | 1-141 | Volume 2: Li Rui Family Correspondence (Letters sent to/from Li Rui, Li Yinghua, Li Wanghua, Li Nanyang, Tang Jiazhen, Ba Tizhong) | 李锐和家庭成员通信 (李琬华, 李英华, 李南央, 唐家桢, 巴悌忠、胡耀邦、华国锋、叶剑英、新华社、唐家桢、巴悌忠、唐亦安、李葆华、赵守一、刘澜波、汪东兴) | Li Rui; Li Wanghua, Li Yinghua; Tang Jiazhen; Ba Tizhong; Li Nanyang | 李锐; 李琬华; 李英华; 唐家桢; 巴悌忠; 李南央 | 1976-1978 |
| 05/12/2014 | 13 | 2 | 1-150 | Volume 3: Li Rui Family Correspondence (Letters sent to/from Ba Tiezhong, Li Nanyang, Li Rui, Li Yinghua, Hu Yaobang, Li Shu, Zheng Baike, Tang Jiazhen, Tang Yi'an) | 李锐和家庭成员通信 (巴悌忠, 李南央, 李锐, 李英华, 唐家桢, 巴悌忠, 胡耀邦, 唐亦安、王兰江、张众吼、黎澍、郑伯克) | Li Rui; Li Yinghua; Tang Jiazhen; Ba Tizhong; Li Nanyang; Tang Yi'an | 李锐; 李琬华; 李英华; 唐家桢; 巴悌忠; 李南央; 唐亦安 | 1978 |
| 05/12/2014 | 13 | 3 | 1-140 | Volume 4: Li Rui Family Correspondence (Letters sent to/from Li Rui, Tang Yi'an, Li Yinghua, Li Nanyang, Ba Tiezhong, Zheng Baike, Wang Lanjiang, Li Shu, Li Wanghua, Chen Yun, Peng Jian) | 李锐和家庭成员通信 (李锐, 唐亦安, 李英华, 李琬华, 李南央, 巴铁悌忠, 郑伯克, 陈云, 彭健、胡耀邦、黎澍、王兰江、李锐反党集团平反决定) | Li Rui; Li Yinghua; Zheng Baike; Wang Lanjiang; Li Wanhua; Li Nanyang | 李锐; 李英华; 郑伯克, 王兰江; 李琬华, 李南央 | 1978-1988 |
| 12/05/2014 | 13 | 4 | | Li Rui Diary (Soviet Union visit) | 李锐日记 | Li Rui | 李锐 | 12/1953-03/1954 |
| 06/01/2015 | 13 | 5 | | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2010 |

| | | | | | | | |
|------------|----|---------|---|--|--------|----|----------------------|
| 06/01/2015 | 14 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2011 |
| 06/01/2015 | 14 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2012 |
| 06/01/2015 | 14 | 3 | Li Rui Meeting Minutes Criticizing and denouncing Li Rui | 批斗李锐大会记录本 | Li Rui | 李锐 | 09/05/1959- |
| 06/01/2015 | 14 | 4.1 | Fan Yuanzhen Minutes, Transcript of Yang Shangkun's talk, a summary of the discussion in the meeting of the Department under CPC Study Committee | 范元甄手抄记录 “一九四五年一月三十一日中直学委会对大会讨论的总结。 杨尚昆同志讲” | | | 1/31/1945 |
| 06/01/2015 | 14 | 4.2-4.6 | The draft of a letter that Li Rui wrote for defending himself against a rumor that Kang Sheng spread in 1959 Lushan Conference smearing Li Rui's reputation | 李锐 “对康生造谣的辩诬信”草稿 | Li Rui | 李锐 | 8/10/1959 |
| 06/01/2015 | 14 | 4.7 | Note from Xu Teli to Li Rui | 徐特立致李锐便条 | | | 08/02/194? |
| 06/01/2015 | 14 | 4.8 | Note from Chen Yun to Li Rui | 陈云致李锐便条 | | | 3/12/1982 |
| 06/01/2015 | 14 | 4.9 | Note from General Xiao Ke to Li Rui | 萧克致李锐便条 | | | 12/12/1997 |
| 06/01/2015 | 14 | 4.10 | Note from General Zhang Aiping to Li Rui | 張愛萍致李锐一封短信 | | | 8/12/1999 |
| 06/01/2015 | 14 | 5 | Li Rui Talk | 國家機關討論歷史決議草稿簡報： 李锐同志談廬山會議 | | | 11/7/1980 |
| 06/01/2015 | 14 | 6 | Li Rui transcription | 关于庐山会议两次常委会记录的说明 | | | 12/1986 |
| 06/01/2015 | 14 | 7 | Chen Youqun Speech | 陈友群发言中直机关讨论历史决议草稿简报第五组第三十三号 | | | 11/17/1980 |
| 06/01/2015 | 14 | 8 | Speeches Collection, Criticizing & Disputes with Li Rui | 批判斗争李锐反党集团发选编 | | | 02/1960 |
| 06/01/2015 | 14 | 9 | Copy of Doc. ZZZ (2000) No. 28 Submit Report to Bo Yibo and Hu Jintao | 送薄一波并胡锦涛关于式出版《中国共产党组织史资料》中央卷的请示报告 中组字【2000】28号 | | | 7/3/2000 |
| 06/01/2015 | 14 | 10 | Copy of letter that Li Rui wrote to Zhao Ziyang & Deng Xiaoping | 李锐至赵紫阳并邓小平关于对邓力群任总书记的信 | | | 7/10/1987 |
| 04/05/2017 | 14 | 11 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1946-1947 |
| 04/05/2017 | 15 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 09/1948-01/1949 |
| 04/05/2017 | 15 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 12/19/1950- |
| 04/05/2017 | 15 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 11/01/1952- |
| 04/05/2017 | 15 | 4 | Li Rui Diary and Poems | 李锐日记 | Li Rui | 李锐 | 02/07/1960-2/21/1960 |
| 04/05/2017 | 15 | 5 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 02/24/1960- |
| 04/05/2017 | 16 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 03/01/1964- |
| 04/05/2017 | 16 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 06/17/1965- |
| 04/05/2017 | 16 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 05/24/1966- |
| 04/05/2017 | 16 | 4 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 01/01/1967- |
| 04/05/2017 | 16 | 5 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 01/01/1977- |
| 04/05/2017 | 16 | 6 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 12/27/1981- |
| 04/05/2017 | 16 | 7 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 12/18/1982- |
| 04/05/2017 | 17 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 08/08/1983- |
| 04/05/2017 | 17 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 03/01/1984- |
| 04/05/2017 | 17 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 08/11/1984- |
| 04/05/2017 | 17 | 4 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 01/01/1985- |
| 04/05/2017 | 17 | 5 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 08/26/1985- |
| 04/05/2017 | 17 | 6 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 04/12/1986- |
| 04/05/2017 | 18 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 01/1987-09/27/1987 |
| 04/05/2017 | 18 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 09/28/1987- |
| 04/05/2017 | 18 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 09/26/1988- |
| 04/05/2017 | 18 | 4 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1990 |
| 04/05/2017 | 18 | 5 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1991 |
| 04/05/2017 | 19 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1992 |
| 04/05/2017 | 19 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1993 |
| 04/05/2017 | 19 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 03/21/1993- |
| 04/05/2017 | 19 | 4 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1994 |

| | | | | | | | |
|------------|----|---|--|--|------------|-----|--------------------|
| 04/05/2017 | 19 | 5 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1995 |
| 04/05/2017 | 19 | 6 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1996 |
| 04/05/2017 | 20 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1997 |
| 04/05/2017 | 20 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1998 |
| 04/05/2017 | 20 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 1999 |
| 04/05/2017 | 20 | 4 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2000 |
| 04/05/2017 | 21 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2001 |
| 04/05/2017 | 21 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 01/2002-08/2002 |
| 04/05/2017 | 21 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 09/2002-04/2003 |
| 04/05/2017 | 21 | 4 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 05/2003-12/2003 |
| 07/30/2018 | 21 | 5 | Li Rui Notebook | 李锐笔记帐 | Li Rui | 李锐 | 1946-1947 |
| 07/30/2018 | 21 | 6 | Li Rui Notebook: Meeting Minutes | 李锐记录本： 三月会议 | Li Rui | 李锐 | 03/1948 |
| 07/30/2018 | 22 | 1 | Li Rui Notebook: Miscellaneous | 李锐笔记帐： 杂记 | Li Rui | 李锐 | 1948-1949 |
| 07/30/2018 | 22 | 2 | Li Rui Notebook: Changsha | 李锐笔记本： 长沙 | Li Rui | 李锐 | 09/1949 |
| 07/30/2018 | 22 | 3 | Li Rui Notebook: Hunan Provincial Party Committee (Volume 1) | 李锐笔记本 （1） | Li Rui | 李锐 | 1950-1951 |
| 07/30/2018 | 22 | 4 | Li Rui Notebook: Hunan Provincial Party Committee (Volume 2) | 李锐笔记本 （2） | Li Rui | 李锐 | 1950-1951 |
| 07/30/2018 | 22 | 5 | Li Rui Notebook: Art | 李锐艺术笔记本 | Li Rui | 李锐 | 1956-1958 |
| 07/30/2018 | 22 | 6 | Li Rui Notebook: Important Talks | 李锐重要报告记录本 | Li Rui | 李锐 | 1962-1966 |
| 07/30/2018 | 22 | 7 | Li Rui Notebook: Organization Department of the CPC Central Committee (3) | 李锐中组部工作笔记 （3） | Li Rui | 李锐 | 10/1982-12/1982 |
| 07/30/2018 | 22 | 8 | Li Rui Notebook: Organization Department of the CPC Central Committee (4) | 李锐中组部工作笔记 （4） | Li Rui | 李锐 | 12/20/1982 |
| 07/30/2018 | 23 | 1 | Li Rui Notebook: Organization Department of the CPC Central Committee (5) | 李锐中组部工作笔记 （5） | Li Rui | 李锐 | 04/1983-05/1983 |
| 07/30/2018 | 23 | 2 | Li Rui Notebook: Organization Department of the CPC Central Committee | 李锐中组部记录本 | Li Rui | 李锐 | 07/1983 |
| 07/30/2018 | 23 | 3 | Li Rui Notebook: Work of Instruction Group (1) | 李锐 三梯队工作本 （1） | Li Rui | 李锐 | 10/1983-02/09/1984 |
| 07/30/2018 | 23 | 4 | Li Rui Notebook: Organization Department of the CPC Central Committee | 李锐 中组部工作本 | Li Rui | 李锐 | 01/1984-08/1984 |
| 07/30/2018 | 23 | 5 | Li Rui Notebook: Discussion Minutes for Editing and Reviewing History Material of CPC Organization | 李锐 笔记铺 | Li Rui | 李锐 | 04/1994 |
| 07/31/2018 | 23 | 6 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 01/01-1948- |
| 07/31/2018 | 23 | 7 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2013 |
| 07/31/2018 | 23 | 8 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2014 |
| 07/31/2018 | 24 | 1 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2015 |
| 07/31/2018 | 24 | 2 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2016 |
| 07/31/2018 | 24 | 3 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2017 |
| 07/31/2018 | 24 | 4 | Li Rui Diary | 李锐日记 | Li Rui | 李锐 | 2018 |
| 07/31/2018 | 24 | 5 | Li Rui Resume Sheet, 1950 | 李锐履历表 | | | 1950 |
| 03/21/2014 | 25 | 1 | Bound photographic reprints: Li Rui and Fan Yuanzhen Diaries and Letters, 1938-1960, Vol. 1 | 影印本： 父母昨日书： 李锐， 范元甄 1938年-1960年通信， 日记集 （第一册） | Li Nanyang | 李南央 | |
| 03/21/2014 | 25 | 2 | Bound photographic reprints: Li Rui and Fan Yuanzhen Diaries and Letters, 1938-1960, Vol. 2 | 影印本： 父母昨日书： 李锐， 范元甄 1938年-1960年通信， 日记集 （第二册） | Li Nanyang | 李南央 | |
| 03/21/2014 | 25 | 3 | Bound photographic reprints: Li Rui and Fan Yuanzhen Diaries and Letters, 1938-1960, Vol. 3 | 影印本： 父母昨日书： 李锐， 范元甄 1938年-1960年通信， 日记集 （第三册） | Li Nanyang | 李南央 | |
| 03/21/2014 | 25 | 4 | Bound photographic reprints: Li Rui and Fan Yuanzhen Diaries and Letters, 1938-1960 Vol. 4 | 影印本： 父母昨日书： 李锐， 范元甄 1938年-1960年通信， 日记集 （第四册） | Li Nanyang | 李南央 | |
| 03/21/2014 | 26 | 1 | Bound photographic reprints: Li Rui and Fan Yuanzhen Diaries and Letters, 1938-1960, Vol. 5 | 影印本： 父母昨日书： 李锐， 范元甄 1938年-1960年通信， 日记集 （第五册） | Li Nanyang | 李南央 | |

| | | | | | | | |
|------------|----|---|---|--|------------|-----|------|
| 03/21/2014 | 26 | 2 | Bound photographic reprints: Li Rui and Fan Yuanzhen Diaries and Letters, 1938-1960, Vol. 6 | 影印本：父母昨日书：李锐，范元甄1938年-1960年通信，日记集（第六册） | Li Nanyang | 李南央 | |
| 05/12/2014 | 26 | 3 | Book: <i>Long Dan Zi Ji</i> (published by Macau Scholars Publishing) | 龙胆紫集 | Li Rui | 李锐 | 2005 |
| 05/12/2014 | 26 | 4 | Book: <i>Fu Mu Zuo Ri Shu: Li Rui, Fan Yuanzhen 1938 nian - 1960 Nian Tong Xin, Ri Ji Ji</i> , Vol. 1 | 父母昨日书：李锐，范元甄1938年-1960年通信，日记集（上） | Li Nanyang | 李南央 | 2005 |
| 05/12/2014 | 26 | 5 | Book: <i>Fu Mu Zuo Ri Shu: Li Rui, Fan Yuanzhen 1938 nian - 1960 Nian Tong Xin, Ri Ji Ji</i> , Vol. 2 | 父母昨日书：李锐，范元甄1938年-1960年通信，日记集（下） | Li Nanyang | 李南央 | 2005 |
| 05/12/2014 | 27 | 1 | Bound photographic reprints: Li Riu's Prison Poems Writing With Gentian, Vol. 1 | 影印本：李锐秦城监狱龙胆紫诗（列宁书） | Li Nanyang | 李南央 | |
| 05/12/2014 | 27 | 2 | Bound photographic reprints: Li Riu's Prison Poems Writing With Gentian, Vol. 2 | 影印本：李锐秦城监狱龙胆紫诗（马克思书） | Li Nanyang | 李南央 | |
| 05/12/2014 | 27 | 3 | Bound photographic reprints: Li Riu & Relatives Letters, 1975-1979, Vol. 1 | 影印本：李锐1975-1979年家信集（1） | Li Nanyang | 李南央 | |
| 05/12/2014 | 27 | 4 | Bound photographic reprints: Li Riu & Relatives Letters, 1975-1979, Vol. 2 | 影印本：李锐1975-1979年家信集（2） | Li Nanyang | 李南央 | |
| 12/05/2014 | 28 | 1 | Bound photographic reprints: Li Rui Diary, 1946-1947, Vol. 1 | 影印本：李锐日记，1946-1947（1） | Li Nanyang | 李南央 | |
| 12/05/2014 | 28 | 2 | Bound photographic reprints: Li Rui Diary, 1948-1949, Vol. 2 | 影印本：李锐日记，1948-1949（2） | Li Nanyang | 李南央 | |
| 12/05/2014 | 28 | 3 | Bound photographic reprints: Li Rui Diary, 1950-10/1952, Vol. 3 | 影印本：李锐日记，1950-10/1952（3） | Li Nanyang | 李南央 | |
| 12/05/2014 | 28 | 4 | Bound photographic reprints: Li Rui Diary, 11/1952-1957, Vol. 4 | 影印本：李锐日记，11/1952-1957（4） | Li Nanyang | 李南央 | |
| 12/05/2014 | 28 | 5 | Bound photographic reprints: Li Rui Diary, 02/1960-1964, Vol. 5 | 影印本：李锐日记，02/1960-1964（5） | Li Nanyang | 李南央 | |
| 12/05/2014 | 28 | 6 | Bound photographic reprints: Li Rui Diary, 02/1969; Poems, 1959-1964, Vol. 6 | 影印本：李锐日记（6） | Li Nanyang | 李南央 | |
| 12/05/2014 | 29 | 1 | Bound photographic reprints: Li Rui Diary, 03/1964-06/1965, Vol. 7 | 影印本：李锐日记，03/1964-06/1965（7） | Li Nanyang | 李南央 | |
| 12/05/2014 | 29 | 2 | Bound photographic reprints: Li Rui Diary, 1965-66; 1975-76, Vol. 8 | 影印本：李锐日记，1965-66; 1975-76（8） | Li Nanyang | 李南央 | |
| 12/05/2014 | 29 | 3 | Bound photographic reprints: Li Rui Diary, 01/1967- 11/1967, Vol. 9 | 影印本：李锐日记，01/1967- 11/1967（9） | Li Nanyang | 李南央 | |
| 12/05/2014 | 29 | 4 | Bound photographic reprints: Li Rui Diary, 1/1977-1/1979, Vol. 10 | 影印本：李锐日记，1/1977-1/1979（10） | Li Nanyang | 李南央 | |
| 06/01/2015 | 29 | 5 | Bound photographic reprints: Li Rui Diary, 12/1981-12/1982, Vol. 11 | 影印本：李锐日记，1981.12 - 1982.12（11） | Li Nanyang | 李南央 | |
| 06/01/2015 | 29 | 6 | Bound photographic reprints: Li Rui Diary, 12/1982-08/1983, Vol. 12 | 影印本：李锐日记，1982.12 - 1983.8（12） | Li Nanyang | 李南央 | |
| 06/01/2015 | 30 | 1 | Bound photographic reprints: Li Rui Diary, 08/1983-02/1984, Vol. 13 | 影印本：李锐日记，08/1983-02/1984（13） | Li Nanyang | 李南央 | |
| 06/01/2015 | 30 | 2 | Bound photographic reprints: Li Rui Diary, 03/1984-08/1984, Vol. 14 | 影印本：李锐日记，03/1984-08/1984（14） | Li Nanyang | 李南央 | |
| 06/01/2015 | 30 | 3 | Bound photographic reprints: Li Rui Diary, 08/1984-12/1984, Vol. 15 | 影印本：李锐日记，08/1984-12/1984（15） | Li Nanyang | 李南央 | |
| 12/09/2015 | 30 | 4 | Bound photographic reprints: Li Rui Diary, 01/1985-08/1985, Vol. 16 | 影印本：李锐日记，01/1985-08/1985（16） | Li Nanyang | 李南央 | |
| 12/09/2015 | 30 | 5 | Bound photographic reprints: Li Rui Diary, 08/1985-04/1986, Vol. 17 | 影印本：李锐日记，08/1985-04/11/1986（17） | Li Nanyang | 李南央 | |
| 12/09/2015 | 30 | 6 | Bound photographic reprints: Li Rui Diary, 04/1986-12/1986, Vol. 18 | 影印本：李锐日记，04/1986-12/1986（18） | Li Nanyang | 李南央 | |
| 12/09/2015 | 30 | 7 | Bound photographic reprints: Li Rui Diary, 01/1987-09/1987, Vol. 19 | 影印本：李锐日记，01/1987-09/1987（19） | Li Nanyang | 李南央 | |
| 12/09/2015 | 31 | 1 | Bound photographic reprints: Li Rui Diary, 09/1987-09/1988, Vol. 20 | 影印本：李锐日记，09/1987-09/1988（20） | Li Nanyang | 李南央 | |
| 12/09/2015 | 31 | 2 | Bound photographic reprints: Li Rui Diary, 09/1988-12/1989, Vol. 21 | 影印本：李锐日记，09/1988-12/1989（21） | Li Nanyang | 李南央 | |
| 12/05/2016 | 31 | 3 | Bound photographic reprints: Li Rui Diary, 1990, Vol. 22 | 影印本：李锐日记，1990（22） | Li Nanyang | 李南央 | |
| 12/05/2016 | 31 | 4 | Bound photographic reprints: Li Rui Diary, 1991, Vol. 23 | 影印本：李锐日记，1991（23） | Li Nanyang | 李南央 | |

| | | | | | | |
|------------|----|----|--|---------------------------------|------------|-----------|
| 12/05/2016 | 31 | 5 | Bound photographic reprints: Li Rui Diary, 01/1992-12/1992, Vol. 24 | 影印本：李锐日记, 01/1992-12/1992 (24) | Li Nanyang | 李南央 |
| 12/05/2016 | 32 | 1 | Bound photographic reprints: Li Rui Diary, 01/1993-12/1993, Vol. 25 | 影印本：李锐日记, 01/1993-12/1993 (25) | Li Nanyang | 李南央 |
| 12/05/2016 | 32 | 2 | Bound photographic reprints: Li Rui Diary, 1994, Vol. 26 | 影印本：李锐日记, 1994 (26) | Li Nanyang | 李南央 |
| 06/07/2016 | 32 | 3 | Bound photographic reprints: Lu Rui 1959 Lushan Meeting Minutes, Relevant Materials and Other Valuable Letters, Vol.1 | 影印本：李锐保存的庐山会议记录和相关资料及其他历史信件 (1) | Li Nanyang | 李南央 |
| 06/07/2016 | 32 | 4 | Bound photographic reprints: Lu Rui 1959 Lushan Meeting Minutes, Relevant Materials and Other Valuable Letters, Vol.2 | 影印本：李锐保存的庐山会议记录和相关资料及其他历史信件 (2) | Li Nanyang | 李南央 |
| 08/04/2017 | 32 | 5 | Bound photographic reprints: Li Rui Diary, 1995, Vol. 27 | 影印本：李锐日记, 1995 (27) | Li Nanyang | 李南央 |
| 08/04/2017 | 33 | 1 | Bound photographic reprints: Li Rui Diary, 1996, Vol. 28 | 影印本：李锐日记, 1996 (28) | Li Nanyang | 李南央 |
| 08/04/2017 | 33 | 2 | Bound photographic reprints: Li Rui Diary, 1997, Vol. 29 | 影印本：李锐日记, 1997 (29) | Li Nanyang | 李南央 |
| 08/04/2017 | 33 | 3 | Bound photographic reprints: Li Rui Diary, 1998, Vol. 30 | 影印本：李锐日记, 1998 (30) | Li Nanyang | 李南央 |
| 08/04/2017 | 33 | 4 | Bound photographic reprints: Li Rui Diary, 1999, Vol. 31 | 影印本：李锐日记, 1999 (31) | Li Nanyang | 李南央 |
| 12/07/2017 | 33 | 5 | Bound photographic reprints: Li Rui Diary, 2000, Vol. 32 | 影印本：李锐日记, 2000 (32) | Li Nanyang | 李南央 |
| 12/07/2017 | 34 | 1 | Bound photographic reprints: Li Rui Diary, 2001, Vol. 33 | 影印本：李锐日记, 2001 (33) | Li Nanyang | 李南央 |
| 12/07/2017 | 34 | 2 | Bound photographic reprints: Li Rui Diary, 01/2002-08/2002, Vol. 34 | 影印本：李锐日记, 01/2002-08/2002 (34) | Li Nanyang | 李南央 |
| 12/07/2017 | 34 | 3 | Bound photographic reprints: Li Rui Diary, 09/2002-04/2003, Vol. 35 | 影印本：李锐日记, 09/2002-04/2003 (35) | Li Nanyang | 李南央 |
| 12/07/2017 | 34 | 4 | Bound photographic reprints: Li Rui Diary, 05/2003-12/2003, Vol. 36 | 影印本：李锐日记, 05/2003-12/2003 (36) | Li Nanyang | 李南央 |
| 07/31/2018 | 34 | 5 | Bound photographic reprints: Li Rui Diary, 2004, Vol. 37 | 影印本：李锐日记, 2004 (37) | Li Nanyang | 李南央 |
| 07/31/2018 | 35 | 1 | Bound photographic reprints: Li Rui Diary, 2005, Vol. 38 | 影印本：李锐日记, 2005 (38) | Li Nanyang | 李南央 |
| 07/31/2018 | 35 | 2 | Bound photographic reprints: Li Rui Diary, 2006, Vol. 39 | 影印本：李锐日记, 2006 (39) | Li Nanyang | 李南央 |
| 07/31/2018 | 35 | 3 | Bound photographic reprints: Li Rui Diary, 2007, Vol. 40 | 影印本：李锐日记, 1995 (40) | Li Nanyang | 李南央 |
| 07/31/2018 | 35 | 4 | Bound photographic reprints: Li Rui Diary, 2008, Vol. 41 | 影印本：李锐日记, 1995 (41) | Li Nanyang | 李南央 |
| 07/31/2018 | 35 | 5 | Bound photographic reprints: Li Rui Diary, 2009, Vol. 42 | 影印本：李锐日记, 1995 (42) | Li Nanyang | 李南央 |
| 03/03/2014 | 36 | 1 | 1 DVD: Li & Fan Letters | | | 1939-1961 |
| 05/12/2014 | 36 | 2 | 2 DVDs: Li Rui's Poems in Gentian Violet in Jail 1973-1975; Li Rui & Relatives Letters 1975-1979 | | | 1973-1979 |
| 12/05/2014 | 36 | 3 | 2 DVDs: Li Rui Diary 1-1; Li Rui Diary 1-2 | | | 1946-1979 |
| 06/01/2015 | 36 | 4 | 2 DVDs, 1 flash drive: 2-1 Transcription of Li Rui Diary 1982/12/27-1984/12 (Word files and PDF files); 2-2 Scanned images of Li Rui Diary Vol. 14 to Vol. 15, 1984/3 to 1984/12 | | | 1982-2014 |
| 12/09/2015 | 36 | 5 | 4 DVDs: Li Rui Diary 4-1; Li Rui Diary 4-2; Li Rui Diary 4-3; Li Rui Diary 4-4 | | | 1985-1989 |
| 12/05/2016 | 36 | 6 | 1 DVD: Scanned images of Li Rui Diary Vol. 22 to Vol. 26, 1990-1994 (PDF files) | | | 1990-1994 |
| 06/07/2016 | 36 | 7 | 1 DVD: Li Rui Lushan Materials | | | 1995-1999 |
| 08/04/2017 | 36 | 8 | 1 DVD: Transcription of Li Rui Diary Vol. 27 to Vol. 31, 1995 (Word files and PDF files) | | | |
| 12/07/2017 | 36 | 9 | 1 DVD: Transcription of Diary Vol. 32 to Vol. 36, 2000-2003 (Word files and PDF files) | | | 2000-2003 |
| 12/05/2016 | 36 | 10 | 1 DVD: Transcription of Li Rui Diary Vol. 22 to Vol. 26, 1990-1994 (Word files and PDF files) | | | 2004-2009 |

EXHIBIT B

Beijing Zhuodai Law Firm

Lawyer's Letter

Dear Mr. / Ms. Laureen Schieron:

Ms. Zhang Yuzhen is Mr. Li Rui's wife and a legal heir to Mr. Li Rui's estate. Mr. Li Rui died on February 16th, 2019. Mr. Li Rui's daughter, Ms. Li Nanyang, disposed Mr. Li Rui's estate without the consent of other lawful heirs of Mr. Li Rui, made a so-called donation to your organization, including Mr. Li Rui's diaries and other letters and work notes, and expressed publicly that she would consult with your organization and agree your organization to make so-called disclosure, publicity, publication, release and distribution of Mr. Li Rui's estate as mentioned above. For this matter, Ms. Zhang Yuzhen officially notified you by mail on March 20th, 2019, informing you that Mr. Li Rui's diaries and other letters and work notes are not owned by Ms. Li Nanyang, Ms. Li Nanyang has no right to donate and disclose the above-mentioned diaries and other materials of Mr. Li Rui, and Mr. Li Rui publicly stated that his diaries shall not be disclosed without his authorization. However, we have received no reply from you. For this reason, Ms. Zhang Yuzhen entrusted us to represent her to handle the case with full authority on March 31th, 2019. We have accepted the entrustment of Ms. Zhang Yuzhen and assigned Lawyer Zhang Jinpeng to handle the case with full authority.

After accepting the entrustment, Lawyer Zhang Jinpeng investigated and verified the relevant evidence and materials, filed a succession dispute lawsuit against Ms. Li Nanyang with Xicheng District People's Court of Beijing of the People's Republic of China on behalf of Ms. Zhang Yuzhen on April 2nd, 2019, and asked your organization to return the above-mentioned diaries and other letters and work notes of Mr. Li Rui. The Xicheng District People's Court of Beijing of the People's Republic of China has officially accepted and filed a case after examination, with the case number of (2019) J0102MC No. 17194. In this regard, you are informed of the following in the Lawyer's Letter:

1. As Mr. Li Rui's wife, Ms. Zhang Yuzhen has the right to inherit Mr. Li Rui's estate; Ms. Li Nanyang has no right to dispose of Mr. Li Rui's estate without the consent of other legal heirs; the donation made by Ms. Li Nanyang to your organization is invalid;

2. Since your organization failed to investigate the legality of Ms. Li Nanyang's ownership of the above-mentioned estate, your organization's acception of it is legally invalid;
3. Before his death, Mr. Li Rui had publicly and clearly stated that he did not agree to disclose and publish his diaries, letters and work notes without his authorization. I have informed Ms. Li Nanyang of immediate withdrawal of her donation from your organization;
4. Your organization and Ms. Li Nanyang shall immediately stop the relevant acts related to so-called disclosure, publicity, publication, release and distribution of Mr. Li Rui's diaries and other letters and work notes. The above-mentioned acts violate the will of Mr. Li Rui because he did not agree the disclosure, and they are suspected of violating the legal rights of Ms. Zhang Yuzhen and other heirs. If your organization and/or Ms. Li Nanyang continues to take any one of the above-mentioned disclosure acts (included but not limited to) and related acts, we will take further legal measures on behalf of Ms. Zhang Yuzhen to hold your organization and/or Ms. Li Nanyang legally liable for infringement;
5. Please contact Ms. Li Nanyang in a timely manner and pay attention to the handling of this case by Xicheng District People's Court of Beijing of the People's Republic of China, so as to avoid any losses to your organization.

In case of any objection, please contact me within seven (7) days after your receipt of the Letter, and please consider my opinions carefully.

E-mail of Lawyer Zhang Jinpeng: **LimsTim134@protonmail.com**

Best Regards

Lawyer: Zhang Jinpeng
Beijing Zhuodai Law Firm

April 5, 2019



EXHIBIT C



Pillsbury Winthrop Shaw Pittman LLP
725 South Figueroa Street, Suite 2800 | Los Angeles, CA 90017-5406 | tel 213.488.7100 | fax 213.629.1033

Mark D Litvack
tel: +1.213.488.7545
mlitvack@pillsburylaw.com

April 20, 2019

Via Email to LimsTim134@protonmail.com

Mr. Zhang Jinpeng
Beijing Zhuodai Law Firm
LimsTim134@protonmail.com

Re: *Your April 5 letter to Hoover*

Dear Sir:

By way of introduction, I and my firm represent The Board of Directors of the Leland Stanford Junior University and the Hoover Institution on War, Revolution and Peace ("Hoover") regarding the letter you recently sent to Hoover on behalf of Mr. Li Rui's widow, Ms. Zhang Yuzhen. As explained below, your letter misstates certain key facts, so we take this opportunity to properly correct the record so that you may understand the true applicable facts to this situation.

Hoover Owns the Donation

I believe the primary misstatement of fact in your letter dated April 5, 2019 is your assertion that this is an inheritance dispute. Based on the facts, that is plainly incorrect. Starting over four years ago, well in advance of his death, Mr. Li Rui entrusted his daughter, Ms. Li Nanyang, with certain diaries, letters, photographs, and other written materials (the "Donation"). Mr. Li Rui instructed Ms. Li Nanyang to make a permanent gift of the Donation to Hoover, where the Donation would be preserved and made available as part of Hoover's archive, which is accessible to the public, for research and review.

Hoover was selected because its overall mission is, from its records, to recall the voice of experience against the making of war, and by the study of these records and their publication, to recall man's endeavors to make and preserve peace. Founded in 1919, the Hoover Institution Library & Archives is dedicated to documenting war, revolution, and peace in the twentieth and twenty-first centuries. With nearly one million volumes and more than six thousand archival collections from 171 countries,

Zhang Jinpeng
April 20, 2019
Page 2

Hoover supports a vibrant community of scholars and a broad public interested in the meaning and role of history. Hoover's many Chinese collections document political, economic, and social developments during the revolution of 1911, the warlord period, the civil war, and the post-1949 period. Holdings on pre-1949 Republican China, including Nationalist government documents and Chinese Communist Party materials, are particularly robust. Also available are accounts of non-Chinese public servants, military officers, engineers, journalists, and scholars who shaped or witnessed developments in China. Given this background, and consistent with her father's wishes, Ms. Li Nanyang properly transferred ownership and physical possession of the Donation to Hoover during Mr. Li Rui's lifetime. As such, the Donation is not a part of Mr. Li Rui's estate and is the property of Hoover.

Furthermore, although you claim that Ms. Zhang Yuzhen is the rightful owner of the Donation, and that Mr. Li Rui did not want the Donation made available to the public, Ms. Zhang Yuzhen has not and cannot provide any evidence or rationale to support her contentions, and she cannot reasonably do so because the evidence is that Mr. Li Rui gave the Donation to Ms. Li Nanyang for the very purpose of transferring ownership of the Donation to Hoover. Further, neither Ms. Zhang Yuzhen nor Mr. Li Rui ever objected to the transfer during Mr. Li Rui's lifetime. On the contrary, multiple entries in Mr. Li Rui's diaries evidence his direct intention to transfer the Donation to Hoover through Ms. Li Nanyang and your client's knowledge of this arrangement.

Given Mr. Li Rui's intent to transfer the Donation to Hoover, and pursuant to the agreements between Ms. Li Nanyang and Hoover, it is clear that Hoover is now the rightful owner of the Donation. This is particularly true as California law presumes that the person in possession of personal property is that property's owner. Cal. Evid. Code § 637 ("The things which a person possesses are presumed to be owned by him."); *see also Metropolitan Finance Corp. of Cal. v. Morf*, 42 Cal. App. 2d 756, 760 (1941) (citations omitted) (possession of personal property is *prima facie* evidence of ownership).

It is beyond dispute that Mr. Li Rui transferred ownership of the Donation during his lifetime to Hoover, the Donation is not a part of Mr. Li Rui's estate, and the Donation is the property of Hoover.

Furthermore, though my client has not been served, I understand that you may have filed litigation consistent with the claims in your letter. Given the above, the Donation is not properly the subject of *any* litigation consistent with your letter. Hoover is within its legal rights to allow access to the Donation. Offering the Donation for study and the purpose of knowledge discovery is the mission of the Hoover Library & Archives. This offering does not violate any legal right of your client. Furthermore, even in the event that a judgment is wrongfully entered in favor of Ms. Zhang Yuzhen in Beijing, there are no laws in California that would require a court in California, where the Donation lies and took place, to enforce a judgment entered by a court in the People's Republic of China ("PRC") regarding the return of Hoover's property.

Zhang Jinpeng
April 20, 2019
Page 3

Accordingly, any judgment that Ms. Zhang Yuzhen might obtain in Beijing would be unenforceable in the United States.

Rights Under China's Laws of Intestate Succession

There are further errors in your analysis, which I would like to briefly address. Putting aside Hoover's proper possession of the Donation, regarding the copyright interests in the Donation, Ms. Li Nanyang is a joint owner of said copyright in the Donation under China's laws of intestate succession. Under the PRC's laws of intestate succession, the first order of the decedent's heirs includes the decedent's spouse, children, and parents. Law of Succession of the People's Republic of China, Chapter II, Art. 10, available at http://www.npc.gov.cn/englishnpc/Law/2007-12/13/content_1383956.htm. As a general rule, successors in the same order inherit in equal shares. *Id.*, Art. 13. Accordingly, Ms. Li Nanyang, Ms. Zhang Yuzhen, and Mr. Li Rui's son, would inherit equal shares of the copyright in the Donation giving Ms. Li Nanyang the right to publish the Donation.

Because the Donation is lawfully owned and possessed by Hoover as a result of Mr. Li Rui's and Ms. Li Nanyang's gift during Mr. Li Rui's lifetime, the Donation is properly the property of Hoover and not a part of Mr. Li Rui's estate, and is therefore not accurately described in your letter. Similarly, Ms. Zhang Yuzhen cannot rightfully prevail in any lawsuit in Beijing consistent with the misstatements of fact in your letter. We therefore respectfully request that you voluntarily dismiss any such litigation.

We look forward to your prompt reply.

Sincerely,

/s/ Mark D. Litvack

Mark D. Litvack

of

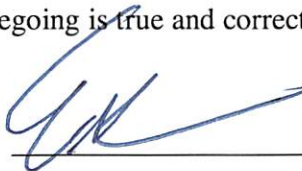
Pillsbury Winthrop Shaw Pittman LLP

VERIFICATION

I, Erik Wakin, am the Deputy Director of the Hoover Institution at Stanford University, the Robert H. Malott Director of the Institution's Library & Archives, and an employee of Stanford University, and am authorized to verify this complaint on behalf of Stanford, the plaintiff in the above-entitled action. I have read the foregoing Complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

I verify under penalty of perjury that the foregoing is true and correct.

Dated: May 24, 2019



Eric Wakin